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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

BRANDI CZERNIEWSKI, individually, as
Personal Representative of the Estate of Bruce
Schepens, as Trustee of the Bruce Schepens
Revocable Trust, and as Trustee of the Bruce
Schepens Separate Property Trust,

Plaintiff,

v.

KRISTINE KEPPEL, an individual, and TD
AMERITRADE, INC., A Foreign Corporation,

Defendants.

Case No.: 2:18-cv-02078-KJD-VCF

**PROPOSED STIPULATION TO
EXTEND TIME TO FILE RESPONSE
OR OPPOSITION TO DEFENDANT TD
AMERITRADE'S: (1) MOTION TO
DISMISS OR STAY PLAINTIFF'S
COMPLAINT; AND (2) MOTION TO
COMPEL ARBITRATION**

(FIRST REQUEST)

Plaintiff BRANDI CZERNIEWSKI, individually, as Personal Representative of the Estate of Bruce Schepens, as Trustee of the Bruce Schepens Revocable Trust, and as Trustee of the Bruce Schepens Separate Property Trust, by and through their undersigned counsel, and Defendant TD Ameritrade, Inc., by and through its undersigned counsel, in compliance with LR IA 6-1 and LR IA 6-2, hereby submit this Proposed Stipulation:

1. The Parties require additional time to confer regarding Defendant TD Ameritrade Inc.'s request to compel arbitration of the claims asserted against it filed on November 2, 2018, with no hearing currently set thereon.

2. Plaintiff shall now have until Friday, November 30, 2018, to file her response to Defendant TD Ameritrade Inc.'s: (1) Motion To Dismiss Or Stay Plaintiff's Complaint; and (2)

Motion To Compel Arbitration.

3. Plaintiff Czerniewski did not file a request for more time before the deadline ran because counsel were not able to confer with each other until the first time on November 15, 2018, at which point the Parties agreed to a limited extension for Plaintiff to file a response to TD Ameritrade's pending Motions so that they could confer again regarding Defendant's request to compel arbitration. The Parties have since traded proposed drafts of the foregoing stipulation on November 16, 2018 and November 19, 2018, which has resulted in the late submission of the foregoing stipulation.

4. This is the first stipulation for extension of time to file responses to TD Ameritrade's pending motions.

It is so stipulated this 19th day of November, 2018.

It is so stipulated this 19th day of November, 2018.

SOLOMON DWIGGINS & FREER, LTD.

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/s/ Ross E. Evans

/s/ Joseph R. Ganley

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Attorneys for Defendant TD Ameritrade, Inc.

Attorneys for Plaintiff, Brandi Czerniewski

ORDER

IT IS SO ORDERED.

Dated this 26th day of November, 2018.


DISTRICT COURT JUDGE

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